

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**IN RE:  
FTX CRYPTOCURRENCY EXCHANGE  
COLLAPSE LITIGATION**

No. 1:23-md-03076-KMM

MDL No. 3076

This Document Relates To:

*Garrison v. Wasserman Media Group, LLC  
and Dentsu McGarry Bowen LLC,*  
No. 23-cv-24478-KMM

**MOTION BY DEFENDANTS DENTSU MCGARRY BOWEN LLC AND WASSERMAN  
MEDIA GROUP, LLC TO EXCEED BRIEFING PAGE LIMIT FOR REPLY TO  
PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO DISMISS**

Defendants, Dentsu McGarry Bowen LLC (“DentsuMB”) and Wasserman Media Group, LLC (“Wasserman”) (collectively the “Defendants”), by and through undersigned counsel and pursuant to Local Rule 7.1(c)(2), hereby file this Motion for Leave to Exceed the Ten (10) Page Limitation set forth by the Local Rule and to file a Reply no longer than twenty-five (25) pages, excluding exhibits, and in support thereof states as follows:

**I. INTRODUCTION**

Under the Local Rules, Defendants would be entitled to ten (10) pages for their Reply. *See* S.D. Fla. L.R. 7.1(c)(2). However, Plaintiffs’ Response to Defendants’ Joint Motion to Dismiss (“Response”) is thirty-nine (39) pages long, citing numerous cases and statutory authority on the state security claims, consumer protection claims, and claims for civil conspiracy and aiding and abetting. Plaintiffs’ Class Action Complaint (the “Complaint”) is one hundred forty-three pages long, with fourteen different causes of action. The additional length for Defendants’ Reply is

necessary to adequately address the volume, scope, and specificity of the allegations, claims, and issues raised in Plaintiffs' Response. Pursuant to the Court's briefing schedule, Defendants will file their Reply on or before May 13, 2024.

## **II. MEMORANDUM OF LAW**

The Court has discretion and inherent authority to permit Defendants to exceed the page limitation requirements of Local Rule 7.1. Pursuant to the Local Rule, "[a]bsent prior permission of the Court, . . . a reply memorandum shall not exceed ten (10) pages. S.D. Fla. L.R. 7.1(c)(2). The Local Rule therefore authorizes this Court to grant leave to file a Reply Motion in excess of the page limit.

Defendants will endeavor to keep its forthcoming Reply succinct and to the point in addressing arguments raised in Plaintiffs' Response. However, given the numerous issues, claims, and exhibits addressed in Plaintiffs' Response, Defendants are requesting to exceed the ten-page limit set forth by the Local Rule to completely address each factual and legal basis set forth in their Reply. However, given the significant and necessary information set forth in the Plaintiffs' Response, Defendants seeks leave to file a Reply no longer than twenty-five pages (excluding exhibits).

## **III. CONCLUSION**

WHEREFORE, with respect to the forthcoming Reply, Defendants, Dentsu McGarry Bowen LLC, and Wasserman Media Group, LLC, respectfully request that this court **GRANT** the Motion, and enter an Order allowing the Defendants to exceed the ten (10) page limit and file a Reply no longer than twenty-five (25) pages.

**LOCAL RULE 7.1(a)(3) CERTIFICATION**

Pursuant to Local Rule 7.1(a)(3), counsel for Defendants conferred with counsel for Plaintiffs and Plaintiffs have no objection to an extra five (5) pages for Defendants' Reply. Plaintiffs take no position on Defendants' requested extension of fifteen (15) pages.

DATED: May 3, 2024

Respectfully submitted,

HOLLAND & KNIGHT LLP

BUCHANAN INGERSOLL & ROONEY PC

/s/ Andrew W. Balthazor

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3rd day of May, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a Notice of Electronic Filing to all counsel of record.

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